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WASHINGTON, D.C. 20548

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FEDERAL PERSONNEL AND
COMPENSATION DIVISION

SEPTEMBER 14, 1981

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The Honorable Donald J. Devine
Director, Office of Personnel
Management

Dear Dr. Devine:

Subject: Obstacles Hamper the Office of Personnel
Management's Evaluation of the Implementa-
tion of the 1978 Civil Service Reform Act.
(FPCD-81-69)

We have recently completed a limited study of the Office of Personnel Management's (OPM's) 5-year strategy for evaluating the implementation and impact of the Civil Service Reform Act of 1978 (CSRA). In that study, we identified problems which, we believe, could hamper the collection of data needed to evaluate CSRA. We are therefore advising you of our findings to assist you in your consideration of the evaluation strategy.

We identified the following management and technical weaknesses which, we believe, warrant your careful consideration.

- The basic objectives of the evaluation are not clearly defined.
- The effective central management of the evaluation's activities and resources is hampered.
- The design and implementation of the evaluation have technical limitations.

In view of these weaknesses, we are concerned whether the ongoing and planned series of studies will provide the information anticipated by the evaluation strategy.

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OBJECTIVES, SCOPE, AND METHODOLOGY

In conducting our limited review, we studied the evaluation strategy package, interviewed officials in the Office of Planning and Evaluation/CSRA Evaluation Management Division (EMD) and the Office of Agency Compliance and Evaluation, and reviewed documentation on the performance appraisal and merit pay case and special studies. We also reviewed the proposals and the first-year draft reports of the university researchers performing the organizational assessments and discussed the work with one of the principal researchers.

OBJECTIVES SHOULD BE DEFINED AND EMPHASIZED

The evaluation's overall objectives are not precisely defined in writing by OPM. The Acting Chief, EMD, defined the objectives generally as a series of long-term studies to determine if CSRA's goals are being met. Without a more precise agency statement of the objectives and a plan for synthesizing and reporting data from the various sources, we could not determine how the accumulated information will be used or how valuable it may be to the Congress, OPM, or other agencies.

Although an earlier draft of the strategy package contained an objective statement, the present strategy package does not contain a statement of the overall objectives of the evaluation. From the strategy package and from discussions with OPM officials, we inferred that the objectives were to examine

- the effects of Government-wide implementation of specific civil service reform initiatives,
- the effects of implementing single reform initiatives in individual agencies, and
- the collective effects of CSRA.

The need for a clear statement of OPM's objectives becomes more apparent when considering the complexity of the evaluation and the involvement of various OPM groups in the series of studies. The OPM strategy for evaluating civil service reform consists of (1) program plans for evaluating 11 individual reform initiatives, such as the Senior Executive Service, the Merit Pay Program, and

the new performance appraisal system, (2) an integrated examination of selected reforms by independent contractors, and (3) a survey of Federal employees' attitudes about the reforms and their effects.

The program plans for evaluating the 11 individual initiatives call for the use of a combination of case studies, special studies, and management information generated by OPM program offices responsible for monitoring implementation of the reforms by Federal agencies. In addition, the evaluation of individual reforms will draw on survey information and the contractors' work. Practically every major operating group in OPM is involved in the 5-year evaluation as either participants in studies or sources of data. Some groups are also making their own short-term assessments of the CSRA implementation.

According to the Acting Chief, EMD, separate reports for each of the major studies will be prepared jointly by EMD and the program offices responsible for carrying out the studies. EMD plans to then periodically issue reports consolidating these individual study efforts. The first summary report is scheduled for the end of calendar year 1981. However, it is not clear to us how OPM plans to tie the accumulated data to the questions contained in the strategy package.

OBSTACLES TO EFFECTIVE CENTRAL MANAGEMENT

Effective central management of OPM's evaluation effort is hampered by

- overlapping authorities in the design, execution, and reporting for the specific projects and
- competing resource demands of the program offices.

The OPM offices participating in the evaluation should have a clear understanding of their responsibilities and the limits of their authorities. In our opinion, the resource demands of short-term assessments may adversely affect the resources available for the long-term studies especially during staff shortage periods.

Overlapping authorities

The authorities and roles of OPM offices contributing to the 5-year evaluation are not clearly defined. Division of responsibilities for project work segments is reached

by group consensus among EMD and the participating program groups. Shared authority for project design, execution, and reporting has resulted in delays.

To meet deadlines imposed on the various studies in the 5-year evaluation, EMD must rely on appeals to the program offices to honor their commitments. The Acting Chief said that EMD's close involvement in the day-to-day progress of ongoing evaluation projects is limited by the small staff assigned to EMD. EMD is now implementing a computerized tracking system which will generate quarterly status reports on the internal CSRA evaluation activities. The data summary sheets, used for coding information into the system, will serve as commitments from the participating groups to meet milestones and to deliver end products.

Competing resource demands

Program offices have a major role in collecting data for segments of the long-term evaluation. However, their primary responsibilities involve providing technical assistance and guidance to the agencies implementing the CSRA initiatives. In carrying out those responsibilities, the offices are concerned with problem identification and resolution to promote program implementation. Because the 5-year evaluation is not designed to provide short-term assessment information on implementation problems, program offices must therefore initiate their own studies to meet these needs.

Since resources needed for short- and long-term evaluation are taken from the same pool, long-term evaluation projects may be delayed by the competition for limited resources during staff shortage periods. For example, analysis of the data collected for the performance appraisal special study was delayed because of staff shortages and the priority of other work. Similar situations could be avoided if the program offices' short-term needs were recognized and steps were taken to avoid the competition for resources.

TECHNICAL LIMITATIONS IN DESIGN AND IMPLEMENTATION

The following technical problems in the evaluation studies may affect the data's usefulness and validity.

- Information developed by most of the evaluation methods cannot be generalized beyond the specific observation sites. The major exceptions are the Federal employees'

attitude survey and some program information systems which will generate Government-wide data.

--The evaluation strategy appears to focus on the collection of data which may provide inadequate support for conclusions about CSRA's implementation.

Three major methodologies--organizational assessments, case studies, 1/ and special studies--are not designed to provide data that can be projected beyond the specific work sites. These studies are designed as onsite evaluations of varying depths to assess the implementation of different CSRA provisions. In an organizational assessment draft report, a contractor cautioned against the comparative use of reports for the five sites studied and stressed the individuality of the data collection at each site. Office of Agency Compliance and Evaluation officials also said that, in most instances, data from the special or case studies cannot be generalized. The General Schedule Classification, Grade and Pay Retention Special Study is the only special or case study designed to provide Government-wide information.

The major emphasis of the studies seems to be placed on the frequency of events at specific sites and on attitudinal change. It is not clear how these studies will collectively generate data needed to (1) support conclusions about the Government-wide implementation of civil service reform initiatives or (2) serve as a basis for recommending legislative or policy changes.

Now that some of the first-round studies have been completed and are in the analysis and report-writing phases, the developed data should be scrutinized to determine if it is the type and quality required to answer the questions posed in the strategy package about civil service reform.

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The issues discussed in this letter may not be a complete list of the obstacles that could be encountered in the CSRA evaluation. However, we are advising you of our findings to assist you in assessing this project.

1/According to the Acting Chief, EMD, case studies conducted by the Office of Agency Compliance and Evaluation were to be discontinued as of August 18, 1981.

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We would appreciate being advised of any action you plan to take as a result of the issues we have raised in this letter and would be happy to meet with you and your staff to discuss these matters further if you wish.

Because of the interest various congressional committees have in civil service reform, we are sending copies of this letter to the Chairmen, House Committee on Post Office and Civil Service and House Subcommittee on Civil Service, and to the Chairmen, Senate Committee on Governmental Affairs and Senate Subcommittee on Civil Service and General Studies.

Sincerely yours,

Clifford I. Gould
Clifford I. Gould
Director

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